

# Attachment 1

**From:** [Poscablo, Christine \(USANYS\)](#)  
**To:** [Roberta Kaplan](#); [Maximilian Crema](#); [Farber, David \(USANYS\)](#)  
**Cc:** [Dror Ladin](#); [Frank, Andrew](#); [Tarczynska, Dominika \(USANYS\)](#); [D. Brandon Trice](#); [Mark Chertok](#); [Elizabeth Knauer](#); [Amy Cassidy](#); [Dane Warren](#); [jnelson](#); [Taylor, Nathan \(Law\)](#); [Stefano Perez](#)  
**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)  
**Date:** Friday, April 4, 2025 10:36:37 AM  
**Attachments:** [Letter from R. Kaplan to Judge Liman re Case Management - 7.55 pm \(SDNY edits\) v2 \(004\).docx](#)

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## External Sender

H All,

We don't have any substantive disagreements. The only outstanding issue is the date by which the Government can produce the administrative record. April 23 is before the answer date and does not give the Government adequate time. Accordingly, we are proposing that we produce the administrative record on May 27 – the same date our answers are due – and build the rest of the schedule from there. (Generally where the parties are cross-moving for summary judgment in APA cases, the parties file their motions, oppositions, and replies at the same time but we are willing to accept the schedule you proposed with the Government filings its motion first.)

We have received sign off from our client on the attached version so if this is acceptable to you all, we are good to go. If there are any outstanding matters you would like to discuss, please let us know and we can set up a call. (And if Riders Alliance and Sierra Club are adding any positions, we would of course need an opportunity to review those additions and determine whether we need to respond before the letter is filed.)

Thanks very much.

Christine

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**From:** Roberta Kaplan <RKaplan@kaplanmartin.com>  
**Sent:** Friday, April 4, 2025 10:05 AM  
**To:** Poscablo, Christine (USANYS) <Christine.Poscablo@usdoj.gov>; Maximilian Crema <mcrema@kaplanmartin.com>; Farber, David (USANYS) <David.Farber@usdoj.gov>  
**Cc:** Dror Ladin <dladin@earthjustice.org>; Frank, Andrew <Andrew.Frank@ag.ny.gov>; Tarczynska, Dominika (USANYS) <Dominika.Tarczynska@usdoj.gov>; D. Brandon Trice <btrice@kaplanmartin.com>; Mark Chertok <mchertok@sprlaw.com>; Elizabeth Knauer <eknauer@sprlaw.com>; Amy Cassidy <acassidy@sprlaw.com>; Dane Warren <dwarren@sprlaw.com>; jnelson <jnelson@sprlaw.com>; Taylor, Nathan (Law) <ntaylor@law.nyc.gov>; Stefano Perez <perezs@nyassembly.gov>  
**Subject:** [EXTERNAL] RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Dear Christine:

Given the below, it may make more sense for each side to do a separate letter.

In light of our prior experience before Judge Liman on the NEPA and other issues relating to the Congestion Pricing Program, we are confident that the Court would expect us to give him a heads up at to any potential disputes about the need for discovery and/or expedited injunctive relief.

Just let us know which method you would prefer.

Very truly yours,

Robbie

**Roberta Kaplan | Kaplan Martin LLP**  
Partner  
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New York, New York 10036  
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[rkaplan@kaplanmartin.com](mailto:rkaplan@kaplanmartin.com)

---

**From:** Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>  
**Sent:** Thursday, April 3, 2025 10:53 PM  
**To:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>; Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>; Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>  
**Cc:** Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>; Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>; Taylor, Nathan (Law) <[ntaylor@law.nyc.gov](mailto:ntaylor@law.nyc.gov)>; Stefano Perez <[perezs@nyassembly.gov](mailto:perezs@nyassembly.gov)>  
**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

**EXTERNAL MESSAGE:** Use caution when opening attachments, clicking links or responding.

Thank you for sending the draft. We have not yet had an opportunity to confer with our client but we have concerns with some of the content of this draft and your representation of certain aspects of our conversation yesterday. As we will articulate for you more fully by tomorrow morning, we think the parties have a general meeting of the minds as to procedural next steps\*\* and need only reach an agreement on timing – (1) amendments to complaints, (2) answers to complaints, (3) production of administrative record, (4) discovery motions (if any), and (5) summary judgment motions thereafter. Much of what you have included in the letter about the potential need to move for discovery or to supplement the record and the potential need for injunctive relief is simply not necessary or called for by the Court’s order. We will aim to get a considerably streamlined draft back to you by mid-morning.

\*\*It was unclear before our call yesterday and seeing your draft today whether you thought you

were entitled to discovery because you asserted non-APA claims or whether your anticipated motions for discovery would turn on the contents of the administrative records, which we have now cleared up.

Thank you.

Christine

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**From:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>

**Sent:** Thursday, April 3, 2025 8:03 PM

**To:** Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>; Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>

**Cc:** Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>; Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>; Taylor, Nathan (Law) <[ntaylor@law.nyc.gov](mailto:ntaylor@law.nyc.gov)>; Stefano Perez <[perezs@nyassembly.gov](mailto:perezs@nyassembly.gov)>

**Subject:** [EXTERNAL] RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Hi Dave,

It's still early in the work day for us associates! But I'm happy to share the draft, which is attached here.

Please note that our sections are subject to review by our clients, and by NYSDOT and NYCDOT.

Best,  
Max

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---

**From:** Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>

**Sent:** Thursday, April 3, 2025 7:39 PM

**To:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>; Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>

**Cc:** Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>; Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy

<[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>; Taylor, Nathan (Law) <[ntaylor@law.nyc.gov](mailto:ntaylor@law.nyc.gov)>; Stefano Perez <[perezs@nyassembly.gov](mailto:perezs@nyassembly.gov)>  
**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

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Robbie/Max,

We had discussed that you would provide a draft of the joint letter due tomorrow by COB today. I know our definitions of “close of business” may differ, but do you still expect to send a draft through this evening?

Thanks,

Dave Farber  
(212) 637-2772

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**From:** Stefano Perez <[perezs@nyassembly.gov](mailto:perezs@nyassembly.gov)>  
**Sent:** Monday, March 31, 2025 7:40 PM  
**To:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>  
**Cc:** Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>; Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>; Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>  
**Subject:** [EXTERNAL] Re: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Good Afternoon Max and everyone,

Thank you for organizing. Wednesday 4/2 at 4:30 p.m. works for Assemblyman Blumencranz.

Best,

**Stefano Pérez, Esq.**

Office of Assemblyman Jake Blumencranz  
New York State Assembly, District 15  
District Office: 111 W. Old Country Road, Suite 202, Hicksville, NY 11801  
Capitol Office: LOB 722, Albany, NY 12248  
Phone: (518) 588-4685

Sent from my iPhone

On Mar 31, 2025, at 5:08 PM, Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)> wrote:

Thanks, all. It looks like Wednesday at 4:30 pm works for just about everyone. Stefano, if you are free at that time I can circulate a calendar invite.

Best,  
Max

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[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)

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**From:** Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>

**Sent:** Monday, March 31, 2025 4:44 PM

**To:** Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>; Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; [perezs@nyassembly.gov](mailto:perezs@nyassembly.gov); Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>

**Cc:** Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>

**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

**EXTERNAL MESSAGE:** Use caution when opening attachments, clicking links or responding.

Max, thanks for organizing this. Riders Alliance and Sierra Club can make the 4:30 slot on Wednesday.

---

**From:** Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>

**Sent:** Monday, March 31, 2025 4:39 PM

**To:** Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>; Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>; Dror Ladin <[dladin@earthjustice.org](mailto:dladin@earthjustice.org)>; Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; [perezs@nyassembly.gov](mailto:perezs@nyassembly.gov); Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>

**Cc:** Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth

Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>

**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

**External Sender**

The State Attorney General's Office is free Wednesday after 4:00.

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**From:** Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>

**Sent:** Monday, March 31, 2025 3:12 PM

**To:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>; Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; [dladin@earthjustice.org](mailto:dladin@earthjustice.org); Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; [perezs@nyassembly.gov](mailto:perezs@nyassembly.gov); Poscablo, Christine (USANYS) <[Christine.Poscablo@usdoj.gov](mailto:Christine.Poscablo@usdoj.gov)>

**Cc:** Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>

**Subject:** RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Max,

The Government is available on Wednesday from 11am to 2pm and after 4:30pm to meet and confer on case management. Please let us know what time works best on your end and please circulate a dial-in or meeting invite.

I have also CC'd my colleague Christine Poscablo – please include her on any emails going forward as well.

Best,

Dave Farber  
(212) 637-2772

---

**From:** Maximilian Crema <[mcrema@kaplanmartin.com](mailto:mcrema@kaplanmartin.com)>

**Sent:** Monday, March 31, 2025 2:10 PM

**To:** Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; [dladin@earthjustice.org](mailto:dladin@earthjustice.org); Tarczynska, Dominika (USANYS) <[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov)>; [perezs@nyassembly.gov](mailto:perezs@nyassembly.gov); Farber, David (USANYS) <[David.Farber@usdoj.gov](mailto:David.Farber@usdoj.gov)>

**Cc:** Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth

Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; jnelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>

**Subject:** [EXTERNAL] RE: MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Counsel,

I received an out-of-office response from Dominika, who represents the federal defendants in the *Duffy* action. In light of the timeline set out in Judge Liman's order, I am adding Dominika's out-of-office contact, David Farber, to the thread. I have reattached Judge Liman's March 28 Order for convenience.

Best,  
Max

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**From:** Maximilian Crema

**Sent:** Monday, March 31, 2025 1:59 PM

**To:** Frank, Andrew <[Andrew.Frank@ag.ny.gov](mailto:Andrew.Frank@ag.ny.gov)>; [dladin@earthjustice.org](mailto:dladin@earthjustice.org);  
[Dominika.Tarczynska@usdoj.gov](mailto:Dominika.Tarczynska@usdoj.gov); [perezs@nyassembly.gov](mailto:perezs@nyassembly.gov)

**Cc:** Roberta Kaplan <[RKaplan@kaplanmartin.com](mailto:RKaplan@kaplanmartin.com)>; D. Brandon Trice <[btrice@kaplanmartin.com](mailto:btrice@kaplanmartin.com)>; Mark Chertok <[mchertok@sprlaw.com](mailto:mchertok@sprlaw.com)>; Elizabeth Knauer <[eknauer@sprlaw.com](mailto:eknauer@sprlaw.com)>; Amy Cassidy <[acassidy@sprlaw.com](mailto:acassidy@sprlaw.com)>; Dane Warren <[dwarren@sprlaw.com](mailto:dwarren@sprlaw.com)>; Jack Nelson <[jnelson@sprlaw.com](mailto:jnelson@sprlaw.com)>

**Subject:** MTA, et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL); Blumencranz v. Hochul, et al., No. 25 Civ. 1787 (LJL)

Counsel,

We represent the MTA and TBTA in connection with the *Duffy* and *Blumencranz* actions, which were marked as related to the other pending congestion pricing challenges and assigned to Judge Liman. As you will have seen, Judge Liman entered the attached order on Friday directing the parties to meet and confer on case management. We are available Tuesday between 12 and 1:30 pm and Wednesday after 1:30 pm. Please advise as to your availability and, with respect to Mr. Blumencranz, when he intends to effectuate service.

Best,  
Max

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Associate  
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